



U.S. Department of Justice

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Eastern District of New York*

AAS/RMP/AS
F. #2021R00600

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July 21, 2025

By Email and ECF

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Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (S-2) (BMC)

Dear Counsel:

Please find below provisional answers to your questions raised in your letter dated July 11, 2025. These answers do not waive the government's right to rely on additional information at trial or to supplement or modify the information contained below. The answers use the defined terms from the Second Superseding Indictment.

1. The coconspirators for Count 1 include both defendants, the Relative, all coconspirators listed in paragraphs 4 through 9 of the Second Superseding Indictment, the Associate, Company-1 Owner, and employees of the PRC Consulate, throughout the charged period.
2. The coconspirators for Count 2 include both defendants, the Relative, all coconspirators listed in paragraphs 4 through 9 of the Second Superseding Indictment, the Associate, Company-1 Owner, and employees of the PRC Consulate, throughout the charged period.
3. All "others" that may have been "knowingly and willfully . . . caused . . . to act as an agent of a foreign principal" by Linda Sun include Company-1 Owner, Chris Hu, and the owner of the Associate Company.

4. Communications that reflect an “order, request, or . . . direction” by a foreign principal include all communications referenced or summarized in paragraphs 26 to 41, 91, and 94 to 97 of the Second Superseding Indictment.
5. Communications that reflect an “order, request, or . . . direction” by any person “whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in part by a foreign principal” include all communications referenced or summarized in paragraphs 43, 46 to 53, 55 to 74, 76, 80, 87, 98, and 103 of the Second Superseding Indictment.
6. Linda Sun’s conduct that constituted “political activities for or in the interest of the foreign principal” included the conduct summarized in paragraphs 26 to 32, 34 to 41, 43, 46 to 76, 91, and 94 to 97 of the Second Superseding Indictment.
7. The materially false statements in the visa “applications and other documents required by the immigration laws and regulations prescribed thereunder” include listing the U.S. contact person as Politician-2 and appending the falsified invitation letter prepared by Linda Sun.
8. The actions by Linda Sun to “encourage[] and induce[] . . . aliens . . . to come to and enter the United States” are summarized in paragraphs 65 to 76 of the Second Superseding Indictment.
9. The “violation of law” pertaining to the entry of the aliens listed in Counts Four through Seven of the Second Superseding Indictment includes 8 U.S.C. § 1325(a)(3) and 18 U.S.C. 1546. The actions by Linda Sun demonstrating her reckless disregard of the violation of law include conduct summarized in paragraphs 65 to 76 of the Second Superseding Indictment.
10. The “commercial advantage” or “private financial gain” underlying Counts Four through Seven are summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
11. The conspirators in Count Eight include the defendants, the Cousin, the Cousin’s wife, and the owner of the Associate Company.
12. The “honest services” at issue were honest services owed by Linda Sun to her employer, the New York State government.
13. The material misrepresentations and omissions underlying Count Eight are summarized in paragraphs 20, 118 to 119, 124 to 125, and 129 of the Second Superseding Indictment.
14. The bribes or kickbacks promised or provided in connection with Count Eight are summarized in paragraphs 20, 119, 121, and 126 to 127 of the Second Superseding Indictment.

15. The “others” included in Count Eight include Chris Hu, the Cousin, and the owner of the Associate Company.
16. The “honest services” at issue were honest services owed by Linda Sun to her employer, the New York State government.
17. The material misrepresentations and omissions underlying Count Nine are summarized in paragraphs 20, 118 to 119, 124 to 125, and 129 of the Second Superseding Indictment.
18. The bribes or kickbacks promised or provided in connection with Count Nine are summarized in paragraphs 20, 119, 121, and 126 to 127 of the Second Superseding Indictment.
19. The “others” included in Count Ten include Chris Hu, the Cousin, and the owner of the Associate Company.
20. The “business and one or more transactions and series of transactions” specified in Count Ten include the transactions involving the Cousin Company summarized in paragraph 120 of the Second Superseding Indictment.
21. The quid pro quo arrangement pertaining to Count Ten is summarized in paragraphs 20, 119, 121, and 126 to 127 of the Second Superseding Indictment.
22. Linda Sun’s solicitation and acceptance of kickbacks underlying Count Ten is summarized in paragraphs 20, 119, 121, 126 to 127, and 148 of the Second Superseding Indictment.
23. Official acts taken by Linda Sun in connection with Count Ten are summarized in paragraphs 20, 119, 121, 124 to 125, and 148 of the Second Superseding Indictment.
24. Coconspirators in Count Eleven include the defendants, the Cousin, and the owner of the Associate Company.
25. Property that the defendants conspired to “embezzle, steal, obtain by fraud, misapply and without other authority convert” include the transactions summarized in paragraph 120 of the Second Superseding Indictment.
26. Linda Sun’s solicitation and acceptance of kickbacks underlying Count Eleven is summarized in paragraphs 20, 119, 121, 126 to 127, and 148 of the Second Superseding Indictment.
27. The “business and one or more transactions and series of transactions” specified in Count Eleven include the transactions involving the Cousin Company summarized in paragraph 120 of the Superseding Indictment.

28. Linda Sun's solicitation and acceptance of kickbacks underlying Count Eleven is summarized in paragraphs 20, 119, 121, 126 to 127, and 148 of the Second Superseding Indictment.
29. Official acts taken by Linda Sun in connection with Count Eleven are summarized in paragraphs 20, 119, 121, 124 to 125, and 148 of the Second Superseding Indictment.
30. Coconspirators in Count Fourteen include the defendants, the Business Partner, the owner of the Associate Company, and one or more money brokers based in Flushing, Queens.
31. The description of origin of the funds pertaining to violations of the Foreign Agents Registration Act, involving Linda Sun, Chris Hu, CC-1, CC-2, the Associate, and the Business Partner, is summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
32. The description of origin of the funds pertaining to violations of the Foreign Agents Registration Act, involving Linda Sun, Chris Hu, CC-1, CC-2, the Associate, and the Business Partner, is summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
33. The description of origin of the funds pertaining to violations of the Bribery in the Third Degree, involving Linda Sun, Chris Hu, CC-1, CC-2, the Associate, and the Business Partner, is summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
34. The description of origin of the funds pertaining to violations of the Bribery in the Third Degree, involving Linda Sun, Chris Hu, CC-1, CC-2, the Associate, and the Business Partner, is summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
35. The description of origin of the funds pertaining to violations of the Bribe Receiving in the Third Degree, involving Linda Sun, Chris Hu, CC-1, CC-2, the Associate, and the Business Partner, is summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
36. The description of origin of the funds pertaining to violations of the Bribe Receiving in the Third Degree, involving Linda Sun, Chris Hu, CC-1, CC-2, the Associate, and the Business Partner, is summarized in paragraphs 78 to 90 and 99 of the Second Superseding Indictment.
37. International wire transfers into the United States underlying Count Fourteen include moneys wired by the Business Partner to Chris Hu through Hu's personal and business accounts, and through one or more money brokers based in Queens, New York.

Very truly yours,

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